

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

BILLY R. WILLIAMS,	:	
	:	
Plaintiff,	:	Civil Action No. 03-239E
	:	
vs.	:	Hon. Maurice B. Cohill, Jr.
	:	
	:	
PENNSYLVANIA STATE POLICE, AN	:	
AGENCY OF THE COMMONWEALTH	:	
OF PENNSYLVANIA,	:	
	:	Electronically Filed
Defendant.	:	

JOINT PROPOSED VOIR DIRE

REQUESTED VOIR DIRE NO. 1

Have you, or has any member of your family, ever worked for or been involved in any manner with any private or government agency which investigates, processes, represents parties to, judges or otherwise deals with complaints involving the workplace. If so, please explain. Identify the agency. Describe the nature of your (or their) job duties.

REQUESTED VOIR DIRE NO. 2

This case involves claims of unlawful employment discrimination. Have you, or any member of your family, ever been the subject of a discrimination claim?

If so, please describe the nature of the claim, the manner in which the claim and discrimination were raised, and the result.

COURT ACTION: _____

REQUESTED VOIR DIRE NO. 3

Have you, or any member of your family, ever filed or raised claims of discrimination against your employer?

If so, please describe the nature of the discrimination claim, the manner in which you filed or raised it, and the result.

COURT ACTION: _____

REQUESTED VOIR DIRE NO. 4

Have you ever been otherwise involved, in any way, in a matter involving claims of employment discrimination, such as a witness?

If so, please describe the matter, your involvement, and the outcome.

COURT ACTION: _____

REQUESTED VOIR DIRE NO. 5

This case involves allegations of unfair treatment on account of race. Have you ever experienced any form of unfair treatment on account of your race, national origin, religion, gender, or age?

If so, please describe the nature of the unfair treatment; the person(s) who treated you unfairly; where you were so treated (e.g., work); what, if anything, you did about it; and the results.

COURT ACTION: _____

REQUESTED VOIR DIRE NO. 6

Do you think that your feelings or experiences regarding employment discrimination claims in general would influence your ability to render an impartial decision in this case?

COURT ACTION: _____

REQUESTED VOIR DIRE NO. 7

Is there any reason why you might feel uncomfortable if you are selected to sit as a juror in an employment discrimination case that involves claims of racial bias? If so, what is it about a case of this sort that might make you uncomfortable?

COURT ACTION: _____

REQUESTED VOIR DIRE NO. 8

Do you believe that unfair treatment on account of race is a major problem in the workplace?

COURT ACTION: _____

Defendant objects to this question on the basis that it exceeds the permitted scope of voir dire by inquiring into the prospective juror's opinion.

REQUESTED VOIR DIRE NO. 9

Do you believe that enough is being done by employers to prevent employment discrimination from occurring?

COURT ACTION: _____

Defendant objects to this question on the basis that it exceeds the permitted scope of voir dire by inquiring into the prospective juror's opinion.

REQUESTED VOIR DIRE NO. 10

Have you ever been the subject of an investigation by an agency of the federal, state, or local government?

If so, please describe.

COURT ACTION: _____

Defendant objects to this question on the basis that it exceeds the permitted scope of voir dire by inquiring into the prospective juror's opinion.

REQUESTED VOIR DIRE NO. 11

Do you believe people should be awarded monetary compensation for discriminatory treatment by their employer?

COURT ACTION: _____

Defendant objects to this question on the basis that it exceeds the permitted scope of voir dire by inquiring into the prospective juror's opinion.

REQUESTED VOIR DIRE NO. 12

Have you ever thought juries award too much or too little money to people for emotional harm?

COURT ACTION: _____

Defendant objects to this question on the basis that it exceeds the permitted scope of voir dire by inquiring into the prospective juror's opinion.

REQUESTED VOIR DIRE NO. 13

Is there any reason why you might be inclined to give the testimony of a supervisor or manager more weight than the testimony of a person who does not work in a supervisory or managerial capacity?

COURT ACTION: _____

REQUESTED VOIR DIRE NO. 14

Do you believe that supervisors who are being accused of unlawful discrimination are not trustworthy witnesses because of the nature of the charges being made against them or because they want to protect their jobs or reputations?

COURT ACTION: _____

Defendant objects to this question on the basis that it exceeds the permitted scope of voir dire by inquiring into the prospective juror's opinion.

REQUESTED VOIR DIRE NO. 15

Have you ever held a job where you have had the authority to hire, fire, discipline or make compensation or promotion decisions about employees? If so, what was your position and briefly describe your job responsibilities?

COURT ACTION: _____

REQUESTED VOIR DIRE NO. 16

_____ Do you have any education, training or experience in Human Resources?

COURT ACTION: _____

REQUESTED VOIR DIRE NO. 17

_____ Do you, or does any member of your family, have any legal training? If so, please explain.

COURT ACTION: _____

REQUESTED VOIR DIRE NO. 18

_____ Do you, or does any member of your family, work in the legal field, whether as an attorney, a legal assistant, a legal secretary, or in any other position? If so:

- _____ a. please identify the employer and the nature of the position; and
- _____ b. describe the nature of the legal practice in which you, or the organization by which you are employed, are engaged (e.g., criminal defense, plaintiff's medical malpractice, insurance defense, etc.).

REQUESTED VOIR DIRE NO. 19

Do you think that your feelings or experiences regarding individual police officers or the police in general would influence your ability to render an impartial decision in this case?

COURT ACTION: _____

REQUESTED VOIR DIRE NO. 20

Do you believe a person's rights have been violated simply because he/she has filed a lawsuit?

COURT ACTION: _____

REQUESTED VOIR DIRE NO. 21

Do you believe a person is entitled to damages simply because they have filed a lawsuit and the case has been brought to trial?

COURT ACTION: _____

REQUESTED VOIR DIRE NO. 22

Do you believe a person is entitled to damages whenever they have suffered a loss regardless of whether his/her employer has engaged in illegal activity?

COURT ACTION: _____

REQUESTED VOIR DIRE NO. 23

Regardless of whether the allegation of discrimination was actually raised, have you, a member of your family, or anyone close to you ever been the victim of discrimination in your opinion based on age, race, national origin?

COURT ACTION: _____

REQUESTED VOIR DIRE NO. 24

Have you, a member of your family, or anyone close to you ever served on or been involved with any organization, group, commission, or club that was concerned with civil rights issues or discrimination in employment?

COURT ACTION: _____

REQUESTED VOIR DIRE NO. 25

Have you, a member of your family, or anyone close to you ever been employed by the Commonwealth of Pennsylvania?

COURT ACTION: _____

Respectfully submitted,

Date: October 30, 2007

/s/Neal A. Sanders
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Billy R. Williams

/s/Dirk D. Beuth
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